

UNITED STATES DISTRICT COURT  
DISTRICT OF DELAWARE

WILLIAM DAVIS, III	)	
	)	
Plaintiff,	)	C.A. No. 04-cv-209
	)	
v.	)	
	)	
FIRST CORRECTIONAL MEDICAL,	)	TRIAL BY JURY OF
INC., et al.,	)	TWELVE DEMANDED
	)	
Defendants.	)	

**DEFENDANT FIRST CORRECTIONAL MEDICAL'S REQUEST FOR  
PRODUCTION OF DOCUMENTS DIRECTED TO PLAINTIFF WILLIAM F.  
DAVIS, III**

TO: William F. Davis, III  
SBI#162762  
Delaware Correctional Center  
1181 Paddock Road  
Smyrna, DE 19977

The defendant(s) requests the plaintiff(s) to produce for examination and copying at the office of the attorney for defendant(s) on or before thirty (30) days from the date of receipt of this request, the following items:

1. All hospital records, doctors' summaries and reports, reports concerning any physical tests performed on or concerning the injured plaintiff and any other matter in writing prepared by or on behalf of any person trained in the healing arts concerning the injured plaintiff's past, present and future physical condition insofar as such matters in writing may be in the possession,

custody or control of the plaintiff or available to the plaintiff, plaintiff's insurer or plaintiff's attorney upon request by them to any doctor, hospital or other person trained in the healing arts.

**RESPONSE:**

2. Copies of all statements, bills or cancelled checks showing the amount charged for services rendered to the injured plaintiff or items sold to the plaintiff in connection with the care of the injured plaintiff's alleged injured.

**RESPONSE:**

3. Copies of all photographs, sketches, diagrams or other drawings taken by or prepared by you or on your behalf or in your possession or available to you concerning any aspect of the litigation.

**RESPONSE:**

4. Copies of Federal Income Tax Returns of the plaintiff for the past five (5) years.

**RESPONSE:**

5. Copies of all statements or summaries or interviews taken of any person with respect to any issue in the case including but not limited to the plaintiff or their agents and the defendant or the defendant's agents.

**RESPONSE:**

6. Copies of all reports of investigation, findings of fact, observation of facts or circumstances or any other matter relating to any aspect of the litigation.

**RESPONSE:**

7. Any reports by any person qualifying as an expert containing opinions and/or facts on which opinions are based concerning any aspect of the litigation.

**RESPONSE:**

8. Insofar as any insurer, including but not limited to, workmen's compensation insurers or automobile PIP coverage insurers may have reports, records or the like which are available to the plaintiff upon request, then copies of such reports and records.

**RESPONSE:**

9. Any other documents or thing in your possession or available to you, in addition to the items specified in previous sections of this request for production which is or may be relevant to any issue in the litigation including but not limited to issues of liability and/or damages.

**RESPONSE:**

10. Copies of all pleadings in any lawsuit in which plaintiff(s) are now or have been a party, either as plaintiff or defendant, which are in the possession of the plaintiff(s) or their attorney or are available to plaintiff(s) or their attorney.

**RESPONSE:**

11. Please provide all memorabilia or images, whether video, photographic, film, or in any other format, of each vacation or trip taken from the date of the accident that is the subject of this litigation to the present.

**RESPONSE:**

12. Please provide all memorabilia or images, whether video, photographic, film, or in any other format, of each competition or physical activity engaged in from the date of the accident that is the subject of this litigation to the present.

**RESPONSE:**

HECKLER & FRABIZZIO

/s/Daniel L. McKenty, Esquire  
DANIEL L. MCKENTY, ESQUIRE  
The Corporate Plaza  
800 Delaware Avenue, Suite 200  
Wilmington, Delaware 19899  
(302) 573-4800  
(302) 573-4806 fax  
[dmckenty@hfddel.com](mailto:dmckenty@hfddel.com)  
Attorney for Defendant First  
Correctional Medical

Dated: April 3, 2008  
17810 / 389059

**VERIFICATION AS TO ANSWERS**

I hereby declare under penalty of perjury that the attached Plaintiff's Responses to Request for Production of Documents Directed to Plaintiff by Defendant are true and correct.

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William F. Davis, III

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Date